



Clean World Engineering, Ltd.

June 14, 2004

US EPA RECORDS CENTER REGION 5



462262

Mr. Doug Zamastil
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Pierce Waste Oil Services, Inc.
Site: Springfield, Illinois
EPA Contract No. QT-IL-02-000374
CWE Project No. U062-800

Dear Mr. Zamastil:

In response to your request, Clean World Engineering, Ltd. (CWE) has examined the April 26, 2004 from K.M. Patel of Schiff Hardin, LLP to M. H. Adams of USEPA, Region 5. This letter raises nine (9) questions concerning the transaction database prepared by CWE. Briefly, CWE's task consisted of examining each page of the records provided to determine if there is any information relating to an entity providing waste oil to Pierce Waste Oil Services or the other two sites (PIERCE). The identified record was called a transaction. Aside from categorizing the type of transaction, no other analytical activity was done. The other significant items in this task was creating hard copies of the microfiche; labeling, sorting and preparing files; data entry into the EARS database; and address update searches.

In reviewing the questions raised in K.M. Patel's letter, questions *one through five* deals with duplicate records. Correlation and/or cross-referencing to identify multiple records associated with a given waste oil transaction was not part of CWE's scope of work. The question of the possibility of duplicate records was discussed with Mr. Carl Kaufman. Consistent with his direction, CWE entered all transactions into the EARS database. No effort was expended in identifying potential or actual duplicate records.

Question *six* relates to transactions, which only list a dollar amount. To enter as gallons, \$0.10 per gallon was used as a conversion factor. This conversion factor was discussed with and concurred by Mr. Carl Kaufman. This was done whenever it was clear that it was a dollar amount. It is possible that unidentified figures, which were dollars, were entered as gallons. It was not in CWE's scope of work to imply anything other than the obvious. Note: if a dollar amount was entered as gallons, the true quantity would be underestimated by a factor of 10 or possibly greater.

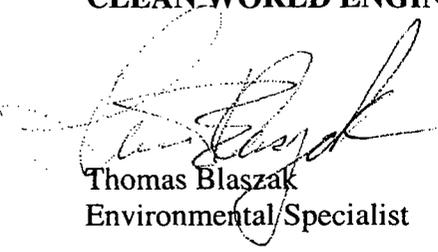
Question *seven* is the only question that CWE can answer. If two quantities (i.e., gross and net) were listed on the same transaction, the larger number was entered into the database. CWE has a plausible explanation for this type of transaction. Generally, one assumes that the source of waste oil would pay PIERCE for removing and disposing/recycling. However, the records provided include a period during the "oil crises", when waste oil was a "saleable commodity" and PIERCE paid for the waste oil, if not badly contaminated with BSW. Hence, payment was based on net not gross gallons. For example, record 40909 attached to K.M. Patel's letter shows for Alcan gross gallons of 6423 with 3% BSW. The net gallons of 6328 are listed at a cost of 600.20 or about 9.5 cents per gallon. This same record shows for Alcan gross gallons of 7178, but more highly contaminated at 15% BSW. The cost for this waste oil was \$0.0. Many other transactions list only one quantity, and if identified, it is gross gallons. Therefore, CWE's use of gross net adds consistency to the database.

Questions *six and seven* relate to the absence of records. K.M. Patel identifies corporations that had locations and activities that were likely to have been sources of waste oil that would be sent/taken by PIERCE but there is no documentation. CWE can only emphasize that we were diligent on examining all the pages provided to identify transactions.

The above comments provide very limited response to the questions raised, since they address issues that were outside of CWE's scope of work. Should you desire any further discussion on CWE's scope of work, on this database or wish to further utilize CWE for an additional task related to the PIERCE enforcement actions, please contact me at (630) 260-0200.

Sincerely,

CLEAN WORLD ENGINEERING, LTD.



Thomas Blaszak
Environmental Specialist



**MARSHA
ADAMS/R5/USEPA/US**

07/15/2004 01:23 PM

To kpatel@schiffhardin.com

cc

bcc

Subject Pierce Oil

Ms. Patel:

This afternoon it is my intention to fax to you a letter from Clean World Engineering, Ltd. to Mr. Doug Zamastil, U.S. EPA, Region 5.

Mr. Zamastil questioned Clean World Engineering about your concerns regarding the data entry of the Pierce Oil liability documents. The letter which I will be faxing to you will answer the concerns which you raised.

I apologize for the delay in getting this letter to you, but based on the information it contained, I needed the time to consider the ramifications (if any) it might have prior to forwarding it to you.

If I can be of any further assistance, please feel free to call me.

Marsha A. Adams
Enforcement Specialist
(312) 353-9484